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Via ECF

The Honorable Sarah Netburn
Judge, United States District Court
Thurgood Marshall United States Courthouse
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May 1, 2017

In re Terrorist Attacks of September 11, 2001, 03 MDL 1570

Dear Judge Netburn,

We write to you on behalf of Dubai Islamic Bank in response to the Court's April 21, 2017 order regarding the proposed deposition(s) of Dr. Hussein Hamid Hassan ("Dr. Hussein"). The Plaintiffs' Executive Committees have reviewed this letter and concur in its contents.

Pursuant to the Court's April 21 order, the Plaintiffs' Executive Committee and counsel for Dubai Islamic Bank have met and conferred regarding a proposed deposition protocol for Dr. Hussein. Due to Ramadan and Eid (followed by the July Fourth holiday), the parties have agreed to schedule Dr. Hussein's deposition(s) in mid-July or shortly thereafter. Plaintiffs have agreed to send shortly their availability for a deposition or depositions in July and August. The parties will then confer in an effort to set a mutually agreeable schedule during this timeframe.

Given the revised timeframe of Dr. Hussein's deposition(s), the parties have agreed to attempt to draft a comprehensive deposition protocol that will apply to all witnesses in the Multidistrict Litigation, including the deposition(s) of Dr. Hussein. As the Court recognized during the hearing of April 21, 2017, finalizing a comprehensive deposition protocol may require input and rulings from the Court, but the parties agree that the best course is to try to finalize such a comprehensive protocol, if possible, prior to the deposition(s) of Dr. Hussein—as opposed to trying to negotiate an ad hoc procedure that would apply only to the deposition(s) of Dr. Hussein.

We are grateful for the Court's guidance in this matter.

Sincerely,
/s/ Steven T. Cottreau
Steven T. Cottreau